

Human Rights Management

At Airtel we believe that economic value cannot be sustained unless it is created on a foundation of ethics and responsibility. Respecting the human rights of stakeholders across our value chain is one of our core priorities, which begins through responsible action at our own operations. Creating a safe and empowered workplace with a culture that drives equal opportunity, non-discrimination, meritocracy and freedom of expression is paramount to us. Similarly, we ensure that our business activities do not adversely impact any of our external stakeholders such as our suppliers, partners, customers and the wider community.

Our commitment to human rights is reinforced through our Code of Business Conduct (COBC), as well as guided by U.N. Universal Declaration of Human Rights and International Labor Organization's declaration on Fundamental Principles & Rights at Work. While these provide the guidelines for responsible business conduct at a global level, our policies are shaped and customized by local regulations. Our Human Rights policy is applicable to all employees across the organization, while the code of conduct for business associates and vendor compliance policy details the requirements for partners and suppliers to uphold and respect human rights.

Human Rights Risk Management

Risk Identification in Own Operations

Training: All employees undergo a training on the COC and other Airtel policies at the time of induction as well as an annual refresher training, to ensure that employee behavior is in line with the principles upheld by the company. This serves as the first step towards our commitment to prevent risks related to human rights.

Due Diligence: In order to identify potential risks, we have a human rights due diligence process which is conducted annually through Airtel's group wide compliance monitoring. This entails undertaking a detailed monitoring at 100% of our sites including all business functions, to track performance on various human rights related subjects such as working conditions, minimum compensation, equal opportunity, privacy and information security, freedom of association etc. including labour laws of the country.

Airtel also regularly tracks human rights issues prevalent across the business sector to update the potential risks which are monitored internally. In addition to this an independent audit is conducted periodically to assess the statutory risks pertaining to human rights and any observations are promptly reported and remediated.

These assessments also enable us to identify 'risk hot spots' or areas where potential human rights issues can occur in our operations, as well as target group of stakeholders i.e. groups most vulnerable to the identified risks.

Ombuds process: We have a robust ombuds process which allows employee, contractors and vendors, to raise a grievance or complaint without any fear of reprisal. Every complaint is addressed through prompt action. Moreover, the ombuds team does a trend analysis basis the complaints received to identify the root causes and accordingly highlight any existing risks of human rights violations to the management.

Sexual Harassment: In order to prevent sexual harassment in workplace, the company has set up Internal Complaints Committees across geographies comprising of a Presiding officer who is a senior level woman employee, one member with legal knowledge or experience in social work, one member from the Ombuds office and one independent member from outside the organization with expertise and experience in dealing with such cases. The committee constitution is communicated to all employees and is also prominently displayed in the public areas of all offices.

Risk Identification in Value Chain

It is our endeavor to not only prohibit undesirable practices but to not associate with any partner who is in dissonance with our principles of ethical practices. Every vendor/supplier before on-boarding, undergoes a comprehensive screening where compliance to labour laws and human rights such as child labour, working conditions, remuneration, freedom of association, health and safety practices etc. is assessed. The suppliers post on-boarding are assessed at regular intervals to ensure timely identification of any existing risks and they are free to raise any concerns/issues through our Ombuds process.

Since stakeholder engagement is decentralized at Airtel, employees are accountable for managing relationships, meeting expectations and thus upholding the human rights of all stakeholders within their areas of responsibility. There are a number of opportunities that allow stakeholders to report grievances /issues which are appropriately addressed. These complaints are also assessed to identify any prevalent risks related to human rights in our value chain or occurring due to our operations, products and services.

Risk Addressal

The risks identified in own operations or in the value chain are addressed through implementation of appropriate corrective actions which can range from risk prevention through awareness sessions and precautionary measures, risk reduction through building capacity and safeguards or risk elimination through modifications in the business process or termination of contract.

Cases of human rights violations are dealt as per our consequence management policy and can include warnings, counselling, penalties and even termination of employment depending upon the severity of violation. In the reporting year, 100% of sites were assessed for risks of human rights violations and no material violations have been reported.

No incidences of child labour, forced labour or discrimination were reported in FY 2018-19. 23 cases of sexual harassment were reported out of which allegations were substantiated in 19 cases. These were addressed through counselling, written warning or termination.